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September 24, 2025

ENTERED
Office of Chief Counsel
September 24, 2025
Part of
Public Record

Via E-Filing

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: Docket No. AB-33 (Sub-No. 354X), *Union Pacific Railroad Company—Abandonment Exemption—In Jefferson County, Wisconsin*

Dear Chief of Case Administration:

Attached for electronic filing is a verified Petition for Exemption pursuant to 49 U.S.C. § 10502. Please file the petition in Docket No. AB-33 (Sub-No. 354X). Pursuant to 49 [CFR](#) § 1002.2(f)(21)(iii), the filing fee of \$9,200 has been paid via [pay.gov](#).

Thank you for your assistance. If you have any questions, please contact me.

Sincerely,

/s/ Christine A. Neuharth
Christine A. Neuharth

Enclosure

FEE RECEIVED
September 24, 2025
SURFACE
TRANSPORTATION BOARD

FILED
September 24, 2025
SURFACE
TRANSPORTATION BOARD

BEFORE THE
SURFACE TRANSPORTATION BOARD

Docket No. AB-33 (Sub-No. 354X)

UNION PACIFIC RAILROAD COMPANY
-- ABANDONMENT EXEMPTION --
IN JEFFERSON COUNTY, WISCONSIN
(JEFFERSON JUNCTION LEAD)

PETITION FOR EXEMPTION

UNION PACIFIC RAILROAD COMPANY

Christine Neuharth
Senior Counsel
1400 Douglas St. MS #1580
Omaha, NE 68179
(402) 544-4764 (Tel.)
caneuhar@up.com

Dated: September 24, 2025

BEFORE THE
SURFACE TRANSPORTATION BOARD

Docket No. AB-33 (Sub-No. 354X)

UNION PACIFIC RAILROAD COMPANY
-- ABANDONMENT EXEMPTION --
IN JEFFERSON COUNTY, WISCONSIN

(JEFFERSON JUNCTION LEAD)

Petition For Exemption

Union Pacific Railroad Company ("Union Pacific") petitions the Surface Transportation Board ("STB" or "Board") to exempt, under 49 U.S.C. § 10502, Union Pacific's abandonment of approximately 0.88 miles of rail line known as the Jefferson Junction Lead between railroad milepost 49.12 at the Clyman Subdivision to milepost 50, near the city of Jefferson, all in Jefferson County, Wisconsin (the "Line"), from the prior approval requirements of 49 U.S.C. § 10503.

I. Proposed Transaction

There is currently no rail traffic on the Line. Union Pacific proposes to abandon the Line and sell the track to Aztalan Bio, LLC ("Aztalan"), the only shipper on the Line, who will remove and reconfigure the track on the Line adjacent to its facility. The reconfigured track will connect into the Clyman Subdivision, where Union Pacific will provide rail service to Aztalan. A map showing the location of the Line to be abandoned is attached to this Petition as **Exhibit 1**.

Aztalan supports abandonment of the Line and has provided a letter of support for this Petition, attached as **Exhibit 2**. Union Pacific also provided Aztalan with a copy of this Petition.

Use of the Line will be limited to: (1) Aztalan movement of railcars at its facilities; (2) storage, loading, and unloading operations; and (3) receipt and delivery of railcars to Union Pacific. No other shipper will be served from the Line. No other industries are located on the Line, and no other shippers have requested to locate on the Line.

The Line traverses U.S. Postal Service Zip Codes 53549 and 53038. Based on information in Union Pacific's possession, the Line does not contain federally granted rights of way. The right of way is primarily fee title. Any documentation in Union Pacific's possession concerning ownership of the Line will be made available to those requesting it.

II. Background

The Line was built by the Milwaukee and Madison Railway as part of a line between Milwaukee and Madison around 1881. The Milwaukee and Madison was then merged into the Chicago and North Western ("CNW"). When CNW rationalized its Wisconsin network in the 1970's and 80's, it abandoned a portion of the line between Waukesha and Cottage Grove but retained a 2.2-mile segment connecting the Clyman line to the Fort Atkinson line to serve a large customer at Jefferson Junction. This 2.2-mile segment became part of the Union Pacific in 1995.

III. Exemption Standards Have Been Met

Union Pacific seeks an exemption under 49 U.S.C. § 10502 from the applicable requirements of 49 U.S.C. § 10903 permitting it to abandon the Line. Under 49 U.S.C. § 10502, the Board must exempt a transaction from regulation when it finds that: (1) continued regulation is not necessary to carry out the rail transportation policy of 49 U.S.C. § 10101; and (2) either (a) the transaction is of limited scope, or (b) regulation is not necessary to protect shippers from an abuse of market power.

The Board has allowed exemptions under similar circumstances in *Union Pacific Railroad Company—Aban. Exemption—in Douglas County, Neb.*, AB 33 (Sub-No. 336X) (STB served March 29, 2019), *Wisconsin Central Ltd.—Aban. Exemption—in Winnebago County, Wis.*, AB 303 (Sub No. 41X) (STB served November 20, 2013), and *CSX Transportation, Inc.—Aban. Exemption—in Washington County, Md.*, AB 55 (Sub-No. 727X) (STB served October 24, 2013).

A. The Application of 49 U.S.C. § 10903 is Not Necessary to Carry Out the Rail Transportation Policy

Detailed scrutiny of this transaction is not necessary to carry out the rail transportation policy. An exemption would minimize the unnecessary expense associated with the preparation and filing of a formal abandonment application, expedite regulatory decisions and reduce regulatory barriers to exit. 49 U.S.C. § 10101 (2), (7). Since Union Pacific will serve the only shipper on the Line, there will be no loss of rail service.

Other aspects of the rail transportation policy are not implicated. For example, competition and the continuation of a sound rail transportation system are not implicated given that Aztalan, the only shipper using the Line, will not be deprived of any needed

rail services. In fact, Aztalan will increase its use of rail service as a new customer following the abandonment.

Granting the Petition would also foster sound economic conditions and encourage efficient management by allowing Union Pacific to better meet its customer's needs. 49 U.S.C. § 10101(5), (9).

B. This Transaction Is of Limited Scope

Union Pacific is seeking this exemption to abandon 0.88 miles of track which serves only one customer. If the exemption is allowed, that customer will retain the same access to rail service it enjoys today. The proposed abandonment is therefore of limited scope.

C. This Transaction Will Not Result in an Abuse of Market Power

Union Pacific will abandon the Line and sell the track to Aztalan. Aztalan will remove and reconfigure the track and Union Pacific will then provide rail service to Aztalan. Union Pacific will access the track to pick up loaded trains and drop off empty cars. Regulation is not necessary to protect the one shipper on the Line because that shipper will benefit from this exemption.

IV. Exemption From Public Use and Interim Trails Use Conditions and Offers of Financial Assistance

Aztalan is the only shipper on the Line and, following consummation of the proposed transaction, will remain the only shipper receiving common carrier rail service from Union Pacific. Aztalan will use the track for its operations. Therefore, public use of the Line is neither feasible nor appropriate. Union Pacific and Aztalan would object to the imposition of a public use condition pursuant to 49 C.F.R. § 1152.28 and be

unwilling to negotiate interim trail uses. These alternative use procedures are inconsistent with the purpose of the Petition.

Given that Aztalan is the only shipper on the Line and Union Pacific will provide rail service to Aztalan as a new customer, it would not be appropriate to allow an offer of financial assistance ("OFA"). If the Board were to allow an OFA, Union Pacific requests the Board require evidence there is a shipper other than Aztalan that would make use of common carrier service on the Line, consistent with Board precedent and OFA procedures.

V. Other Required Information

A. Labor Protection

Union Pacific is agreeable to the labor protection conditions imposed in abandonment proceedings as prescribed in *Oregon Short Line R. Co. – Abandonment – Goshen*, 360 ICC 91 (1979).

B. Certifications

Attached as **Exhibit 3** is a Certificate of Service and Publication, pursuant to the notice requirements of 49 C.F.R §§ 1152.50(d)(1), 1105.11 and 1105.12.

C. Environmental And Historic Reports

A copy of the cover letter which accompanied Union Pacific's Combined Environmental and Historic Report ("CEHR"), containing the information required by 49 C.F.R. §§ 1105.7(e) and 1105.8, and delivered in accordance with 49 C.F.R. 1105.11, is attached as **Exhibit 4**, along with a copy of the CEHR, and a recently received reply from U.S. Fish & Wildlife Services, attached as **Exhibit 4 - Attachment 1**.

D. Federal Register Notice

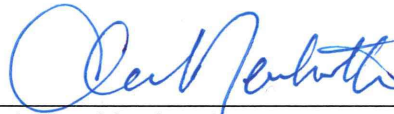
A draft Federal Register notice is attached to this Petition as **Exhibit 5**.

VI. Conclusion

The proposed transaction is of limited scope and continued regulation is not necessary to carry out the rail transportation policy or to protect shippers from the abuse of market power. Union Pacific respectfully requests that the Board issue a decision exempting the proposed abandonment from the provisions of 49 U.S.C. § 10903 and direct that the exemption be effective on the date of the Board's decision.

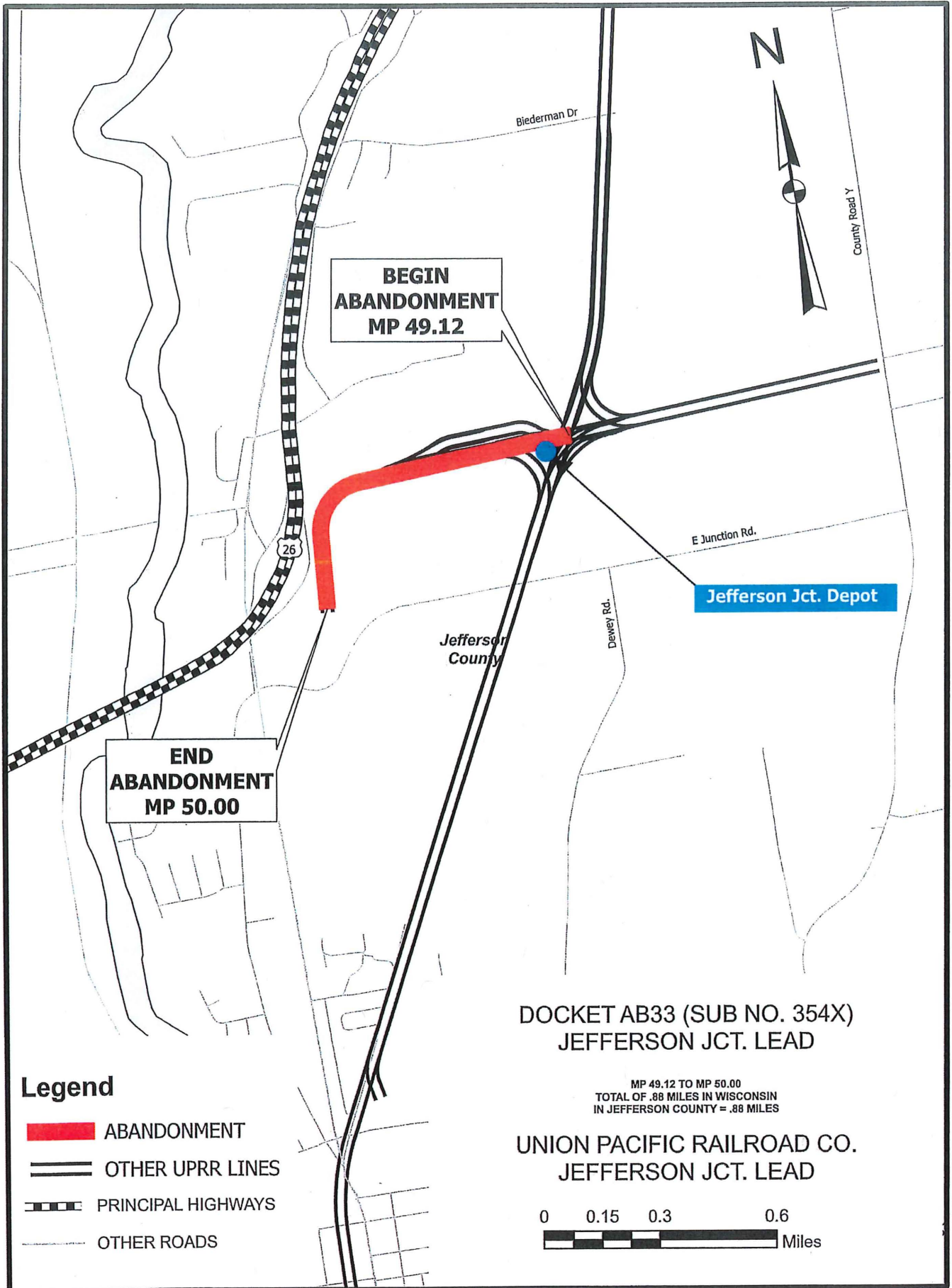
Respectfully submitted,

UNION PACIFIC RAILROAD COMPANY



Christine Neuharth
Senior Counsel
1400 Douglas St. MS #1580
Omaha, NE 68179
(402) 544-4764 (Tel.)
caneuhar@up.com

Dated: September 24, 2025



September 17, 2025

Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: Union Pacific Railroad Company (“UP”) Proposed Abandonment, Jefferson County, Wisconsin (Jefferson Junction Lead)

Dear Surface Transportation Board:

Aztalan Bio LLC (“Aztalan”) is a biorefinery that produces ethanol and other co-products from corn using innovative dry fractionation technology. We are located in the village of Aztalan, just outside Jefferson, Wisconsin.

Currently, Aztalan transports all its feed products and co-products by truck, which places limitations on volume, efficiency, and cost-effectiveness. By being served directly by Union Pacific, our facility will be able to ship approximately 75,000 tons of feed products nationwide each year, moving larger quantities more efficiently and at a lower cost. This improvement not only strengthens our competitiveness but also benefits the surrounding community by reducing truck traffic on local roads, lowering emissions, and supporting long-term economic growth in Jefferson County. Improved rail access will also allow us to better serve local farmers by creating stronger markets for their crops, ensuring their products can reach a wider customer base, and keeping more of the economic value within the region.

Aztalan has been working with Union Pacific on this project for more than two years, recognizing early on that expanded rail access is essential to our long-term success. Direct access to the national rail network will improve our supply chain by opening new markets, providing faster speed of service, and increasing reliability compared to our current dependence on trucking. With rail, we expect to cut truck reliance by more than 25%, which reduces congestion, decreases emissions, and lessens wear on local highways.

UP has notified us that it plans to seek authority from the Surface Transportation Board to abandon 0.88 miles of rail line known as the Jefferson Junction Lead between railroad milepost 49.12 at the Clyman Subdivision to milepost 50, near the city of Jefferson, all in Jefferson County, Wisconsin (the “Line”). We have entered into an agreement with UP to purchase the track on the Line once the abandonment proceeding is completed, and we intend to use the Line for the movement of railcars at Aztalan’s facility, including the storage of railcars, loading and unloading operations, and the receipt and delivery of railcars to UP.

Aztalan strongly supports the proposed abandonment. We are excited to be a new customer, and rail service will allow us to expand our markets, move products more efficiently, and enhance supply chain reliability while reducing our reliance on trucking. Beyond the direct benefits to our business, this project will support local economic growth, create job opportunities, and strengthen Jefferson County’s role as a hub for agriculture and renewable energy. Aztalan has made a

significant commitment to investing in infrastructure that supports industrial growth and economic vitality in this area, and we look forward to working collaboratively to implement this project.

Please do not hesitate to contact us should you require any additional information or assistance in advancing this effort.

Sincerely,



Mark Palmer
Chief Technical Officer
Aztalan Bio LLC
(920) 314-0951
mpalmer@clonbio.com

Docket No. AB-33 (Sub-No. 354X)

UNION PACIFIC RAILROAD COMPANY
-- ABANDONMENT EXEMPTION --
IN JEFFERSON COUNTY, WISCONSIN
(JEFFERSON JUNCTION LEAD)

CERTIFICATE OF SERVICE AND PUBLICATION

49 C.F.R. § 1152.50(d)(1) – Notice

The undersigned certifies that on (at least 10 days before a Notice of Exemption is filed), written notice was given by Union Pacific stating Union Pacific's intent to use the Petition for Exemption procedure to abandon a portion of the Jefferson Junction Lead, extending from Milepost 49.12 to Milepost 50 in Jefferson County, Wisconsin in Docket No. AB-33 (Sub-No. 354X).

Said written notice (a copy of which is attached hereto as **Attachment 1**) was served on the following:

Attn: ADTE – SA
Railroads for National Defense Program
Transportation Engineering Agency
Headquarters Military Surface Deployment
& Distribution Command
709 Ward Drive, Building 1990
Scott AFB, IL 62225-5357

Chief of the Forest Service
U. S. Department of Agriculture
4th Floor, N.W. Auditors Bldg.
1400 Independence Ave. SW
Washington, DC 20250-1111

Attn: Recreation Resources Assistance Division
National Park Service
1849 C Street NW
Washington, DC 20240

Public Service Commission of Wisconsin
P.O. Box 7854
Madison, Wisconsin 53707-7854

49 C.F.R. § 1105.11 – Transmittal Letter for Applicant’s Report

The undersigned certifies that on (at least 20 days before a Notice of Exemption is filed), a Combined Environmental and Historic Report pursuant to 49 C.F.R. § 1105.7 and 1105.8 was served in Docket No. AB-33 (Sub-No. 354X) on the following:

- (1) State Clearinghouse (or alternate)
- (2) State Environmental Protection Agency
- (3) Head of each County
- (4) U.S. Environmental Protection Agency, Regional Office
- (5) U.S. Fish and Wildlife Service
- (6) U.S. Army Corps of Engineers
- (7) National Park Service
- (8) U.S. Natural Resources Conservation Service
- (9) The National Geodetic Survey
- (10) Other Agencies Consulted (As Listed)
- (11) State Historic Preservation Office

(The Certificate of Service attached to Combined Environmental Historic Reports lists the names and addresses of the federal, state and local agencies.)

49 C.F.R. § 1105.12 – Newspaper Notice

The undersigned further certifies that a “Notice of Intent to Abandon and Discontinue Service” was published in the form prescribed by the Board for a Notice of Exemption (Copy Attached as **Attachment 2**). The Notice was published one time in a major newspaper in the county in which the Line is located as follows:

<u>County</u>	<u>Newspaper</u>	<u>Date</u>
Jefferson	Daily Jefferson County Union	08/28/2025

Dated this 24th day of September, 2025.



Christine A. Neuharth



BUILDING AMERICA®

August 25, 2025

Via U.S. Mail

ATTN: ADTE – SA
Railroads for National Defense Program
Transportation Engineering Agency
Headquarters Military Surface Deployment &
Distribution Command
709 Ward Drive, Building 1990
Scott AFB, IL 62225-5357

Chief of the Forest Service
U. S. Department of Agriculture
4th Floor, N.W. Auditors Bldg.
1400 Independence Ave. SW
Washington, DC 20250-1111

ATTN: Recreation Resources Assistance Division
National Park Service
1849 C Street NW
Washington, DC 20240

Public Service Commission of Wisconsin
P.O. Box 7854
Madison, Wisconsin 53707-7854

Re: Proposed Abandonment and Discontinuance of the Jefferson Junction Lead, a total distance of approximately 0.88 miles in Jefferson County, Wisconsin STB Docket No. AB-33 (Sub-No. 354X)

Dear Sir or Madam:

Please be advised that Union Pacific Railroad Company ("UP") expects to file with the United States Surface Transportation Board ("STB"), on or after September 5, 2025, a Petition for Exemption seeking authority for UP to abandon and discontinue service on the Jefferson Junction Lead between railroad milepost 49.12 to milepost 50, a total distance of approximately 0.88 miles, near the city of Jefferson, all in Jefferson County, Wisconsin (the "Line"). The Line traverses U.S. Postal Service Zip Codes 53549 and 53038.

A Petition for Exemption to abandon the Line pursuant to 49 U.S.C. § 10502 and 49 C.F.R. § 1152.60 will be filed with the STB on or after September 5, 2025.

Based on information in UP's possession, the Line does not contain federally granted right-of-way. Any documentation in UP's possession will be made available promptly to those requesting it.

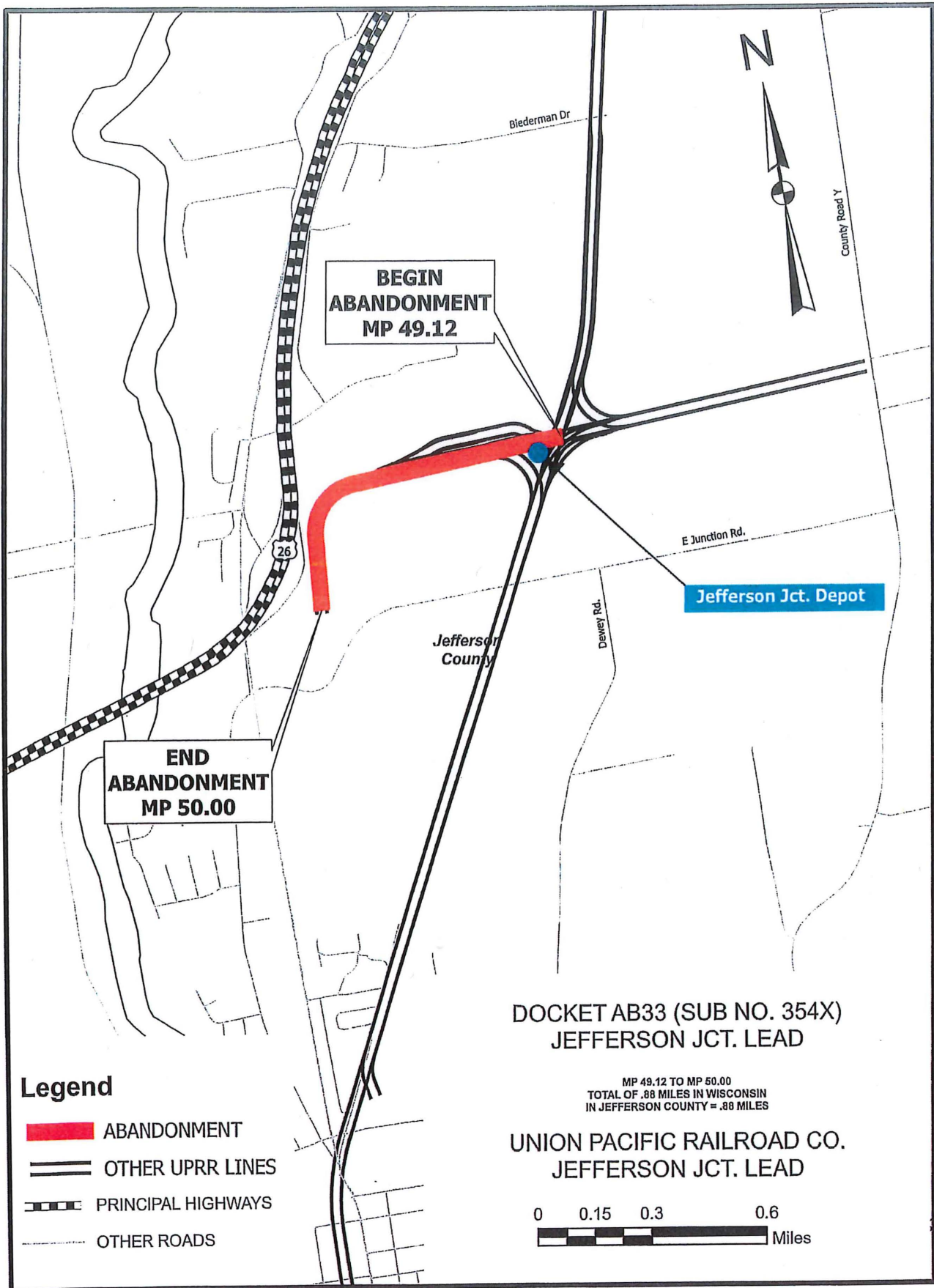
A map showing the segment of Line to be abandoned is attached for your information.

Sincerely,

s/Christine A. Neuharth

Christine A. Neuharth
Senior Counsel

Attachment: Map



Affidavit - Proof of Publication

STATE OF WISCONSIN }
 } SS.

Michele Richardson being duly sworn deposes and says that he/she is the principal clerk of Adams Publishing Group of Southern Wisconsin, publishers of **Daily Jefferson County Union**, a newspaper published in , and that a notice, printed copy of which taken from said newspaper, is hereunto attached, was published in said newspaper on the following dates:

08/28/25

Publishing Fees: **\$225.00**

Signature:

Michele Richardson

Subscribed and sworn to before me
this **28th** day of **August**, A.D. **2025**

Notary Public

Jennifer J Noble

My Commission Expires: *3/9/27*

NOTICE OF INTENT TO ABANDON

UNION PACIFIC RAILROAD COMPANY (UP) GIVES NOTICE THAT ON OR AFTER September 5, 2025, it intends to file with the Surface Transportation Board, Washington, D.C. a petition for exemption under 49 U.S.C. § 10502 from the prior approval requirements of 49 U.S.C. 10503, et seq., permitting the abandonment of the Jefferson Junction Loop, a 6.08 mile line of railroad near Jefferson City between railroad milepost 48.12 and railroad milepost 50, which traverses U.S. Postal Service ZIP Codes 53549 and 53038 all in Jefferson County, WI. The proceeding has been docketed as No. AB-33 (Sub-No. 354X).

The Board's Office of Environmental Analysis (OEA) will generally prepare an Environmental Assessment (EA), which will normally be available 60 days after the filing of the petition for abandonment exemption. Comments on environmental and energy matters should be filed no later than 30 days after the EA becomes available to the public and will be addressed in a Board decision. Interested persons may obtain a copy of the EA or make inquiries regarding environmental matters by writing to the Office of Environmental Analysis (OEA), Surface Transportation Board, 395 E Street, SW, Washington, DC 20423 or by calling that office at (202) 245-4300.

Appropriate offers of financial assistance to continue rail service can be filed with the Board. Requests for environmental conditions, public use conditions, or rail banking/trails use also can be filed with the Board. An original and 10 copies of any pleading that raises matters other than environmental issues (such as title use, public use, and offers of financial assistance) must be filed directly with the Board's Office of Proceedings, 395 E Street, SW, Washington, DC 20423 (See 49 CFR 1104.1(a) and 1104.2(a)), and one copy must be served on the applicant's representative. (See 49 CFR 1104.12(a)) Questions regarding offers of financial assistance, public use or trails use may be directed to the Board's Office of Public Assistance, Governmental Affairs, and Compliance at (202) 245-6238. Copies of any comments or requests for conditions should be served on UP's representative, Christina A. Neuharth, Senior Counsel, 1407 Douglas St., Matlapot 1660, Omaha, NE 68119, 402-554-4764.

UNION PACIFIC RAILROAD COMPANY

**BUILDING AMERICA®**

August 15, 2025

Via US Mail or e-mail**TO: See Attached Service List****Re:** Proposed Abandonment and Discontinuance of the Jefferson Junction Lead, a total distance of approximately 0.88 miles in Jefferson County, Wisconsin; STB Docket No. AB-33 (Sub-No.354X)

To Whom It May Concern:

On or after September 5, 2025, Union Pacific Railroad Company ("UP") expects to be filing with the Surface Transportation Board ("STB" or "Board") a Petition for Exemption seeking authority to abandon and discontinue service over a line segment known generally as the Jefferson Junction Lead (the "Line") between railroad milepost 49.12 to milepost 50, a total distance of approximately 0.88 miles, near the city of Jefferson, all in Jefferson County, Wisconsin, traversing U.S. Postal Service Zip Codes 53549 and 53038 (the "Line"). Attached is a Combined Environmental and Historic Report describing the proposed action and any expected environmental and historic effects, as well as a map of the affected area.

Union Pacific is providing this report so that you may review the information that will form the basis for the STB's independent environmental analysis of this proceeding. If any of the information is misleading or incorrect, if you believe that pertinent information is missing, or if you have any questions about the Board's environmental review process, please contact the Office of Environmental Analysis (OEA), Surface Transportation Board, Washington, DC, telephone (202) 245-0300 and refer to the above Docket No. Because the applicable statutes and regulations impose stringent deadlines for processing this action, your written comments to OEA (with a copy to our representative) would be appreciated within three weeks.

Your comments will be considered by the Board in evaluating the environmental and/or historic preservation impacts of the contemplated action. If there are any questions concerning this proposal, please contact our representative directly. Our representative in this matter is Christine A. Neuharth who may be contacted by telephone at 402-544-4764 or by mail at 1400 Douglas Street, MS 1580, Omaha, NE 68179.

Sincerely,

s/ Christine A. Neuharth

Christine A. Neuharth, Senior Counsel
Union Pacific Railroad Company
1400 Douglas Street, MS 1580
Omaha, Nebraska 68179
(402) 544-4764
caneuhar@up.com

Attachment

STB Docket No. AB-33 (Sub-No. 354X)

Service List

State Clearinghouse (or Alternate):

Public Service Commission of Wisconsin
P.O. Box 7854
Madison, Wisconsin 53707-7854

State Environmental Protection Agency:

Environmental Management Division
Wisconsin Department of Natural Resources
101 S. Webster Street
PO Box 7921
Madison, WI 53707-7921

Head of Jefferson County, Wisconsin:

Jefferson County Administrator
311 S. Center Avenue, Room C2040
Jefferson WI 53549

Environmental Protection Agency (Regional Office):

US EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60604--3507

U.S. Fish and Wildlife Service:

U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

U.S. Army Corps of Engineers:

Headquarters, U.S. Army Corps of Engineers
441 G Street NW
Washington, DC 20314-1000

National Park Service:

National Park Service
1849 C Street NW
Washington, DC 20240

U.S. Natural Resources Conservation Service:

Natural Resource Conservation Service
1400 Independence Ave.
Washington, DC 20250

National Geodetic Survey:

NGS Information Services, NOAA, N/NGS12
Geodetic Services Division SSMC-3 #9340
1315 E-W Highway
Silver Spring, Maryland 20910-3282
rrea@noaa.gov

Wisconsin Historical Preservation Office:

Wisconsin Historical Society
State Historic Preservation Office
816 State Street
Madison, WI 53706
compliance@wisconsinhistory.org

BEFORE THE
SURFACE TRANSPORTATION BOARD

Docket No. AB-33 (Sub-No. 354X)
UNION PACIFIC RAILROAD COMPANY
-- ABANDONMENT EXEMPTION --
IN ST. JEFFERSON COUNTY, WI
(JEFFERSON JUNCTION LEAD)

Combined Environmental and Historic Report

UNION PACIFIC RAILROAD COMPANY
Christine A. Neuharth
Senior Counsel
1400 Douglas Street, MS 1580
Omaha, NE 68179
402-544-4764
caneuhar@up.com

Dated: August 15, 2025

BEFORE THE
SURFACE TRANSPORTATION BOARD

Docket No. AB-33 (Sub-No. 354X)
UNION PACIFIC RAILROAD COMPANY
-- ABANDONMENT EXEMPTION --
IN JEFFERSON COUNTY, WI
(JEFFERSON JUNCTION LEAD)

Combined Environmental and Historic Report

Union Pacific Railroad Company ("UP") submits this Combined Environmental and Historic Report ("CEHR") pursuant to 49 C.F.R. § 1105.7(e) and 49 C.F.R. § 1105.8(d), respectively, for an exempt abandonment of that portion of the Jefferson Junction Lead extending from Milepost 49.12 at the Clyman Subdivision to Milepost 50, near the city of Jefferson, all in Jefferson County, Wisconsin, a total distance of 0.88 miles (the "Line"). The Line traverses U.S. Postal Service Zip Codes 53549 and 53038.

UP's proposed abandonment of the Line is the subject of the present CEHR. A map of the Line (**Attachment No. 1**), and UP's letter to federal, state and local government agencies (**Attachment No. 2**), are attached to this CEHR. There is one structure on the Line, the depot at Jefferson Junction adjacent to the Clyman Subdivision, which will be retained for continued railroad operations. Responses received thus far to UP's letters are also attached.

ENVIRONMENTAL REPORT

49 C.F.R. § 1105.7(e)

(1) Proposed action and alternatives. Describe the proposed action, including commodities transported, the planned disposition (if any) of any rail line and other structures that may be involved, and any possible changes in current operations or maintenance practices. Also describe any reasonable alternatives to the proposed action. Include a readable, detailed map and drawings clearly delineating the project.

Response: As relevant here, the proposed action involves an exempt abandonment of that portion of the Jefferson Junction Lead extending from Milepost 49.12 at the Clyman Subdivision to Milepost 50, near the city of Jefferson, all in Jefferson County, Wisconsin, a total distance of 0.88 miles (the "Line"). There is one structure on the Line, the depot at Jefferson Junction adjacent to the Clyman Subdivision, which will be retained for continued railroad operations. The subject track is contained within ZIP codes 53549 and 53038. The track is laid with 90-pound rail. A map of the Line is attached as **Attachment No. 1**.

The Line was built by the Milwaukee and Madison Railway as part of its line between its namesake cities around 1881. The Milwaukee and Madison was then merged into the Chicago and North Western (CNW). When the CNW was rationalizing its Wisconsin network in the 1970's and 80's, it abandoned a portion of the line between Waukesha and Cottage Grove but kept a 2.2 mile segment connecting to the Clyman-to-Fort-Atkinson line to serve a large customer at Jefferson Junction. In 1995, this 2.2-mile segment became part of the UP.

UP's real property interest in the Line is primarily fee in nature. Based upon information in UP's possession, the Line does not contain federally granted right-of-way.

There is currently no rail traffic on the Line. In connection with the abandonment, UP proposes to sell the track to Aztalan Bio, LLC ("Aztalan"), the only shipper on the

Line, who will remove and reconfigure the track on the Line adjacent to its facility. The reconfigured track will connect into UP's Clyman Subdivision, where UP will then provide rail service to Aztalan. Aztalan's use of the Line will be limited to: (1) movement of railcars at Aztalan's facilities; (2) storage, loading, and unloading operations; and (3) receipt and delivery of railcars to UP. No other shipper will be served from the Line.

No other industries are located on the Line and no other shippers have requested to locate on the Line.

(2) Transportation System. Describe the effects of the proposed action on regional or local transportation systems and patterns. Estimate the amount of traffic (passenger or freight) that will be diverted to other transportation systems or modes as a result of the proposed action.

Response: No traffic will be diverted to other transportation systems or modes as a result of the proposed abandonment.

(3) Land Use.

(i) Based on consultation with local and/or regional planning agencies and/or a review of the official planning documents prepared by such agencies, state whether the proposed action is consistent with existing land use plans. Describe any inconsistencies.

(ii) Based on consultation with the U.S. Soil Conservation Service, state the effect of the proposed action on any prime agricultural land.

(iii) If the action affects land or water uses within a designated coastal zone, include the coastal zone information required by 49 C.F.R. § 1105.9.

(iv) If the proposed action is an abandonment, state whether or not the right-of-way is suitable for alternative public use under 49 U.S.C. § 10905 and explain why.

Response:

(i) UP is unaware of any adverse effects on local and existing land use plans. The Head of Jefferson County has been contacted. To date, UP

has not received a response.

(ii) The Natural Resources Conservation Service (“NRCS”) has responded that the project is not subject to the Farmland Protection Policy Act. See e-mail attached to **Attachment 2**.

(iii) Not Applicable.

(iv) Public use of the Line is neither feasible nor appropriate. Following consummation of the proposed abandonment, UP plans to sell the track to Aztalan, the only shipper using the Line. Aztalan will remove and reconfigure the track and use it for its operations. UP will then provide rail service to Aztalan.

(4) Energy.

(i) Describe the effect of the proposed action on transportation of energy resources.

(ii) Describe the effect of the proposed action on recyclable commodities.

(iii) State whether the proposed action will result in an increase or decrease in overall energy efficiency and explain why.

(iv) If the proposed action will cause diversions from rail to motor carriage of more than:

(A) 1,000 rail carloads a year, or

(B) an average of 50 rail carloads per mile per year for any part of the affected line, quantify the resulting net change in energy consumption and show the data and methodology used to arrive at the figure given.

Response: (i) There are no effects on the transportation of energy resources.

(ii) There are no recyclable commodities moved over the Line.

(iii) There will be no change in energy consumption from the proposed

action.

(iv)(A)(B) There will not be any rail-to-motor diversion of freight traffic.

(5) Air. (i) If the proposed action will result in either:

(A) an increase in rail traffic of at least 100% (measured in gross ton miles annually) or an increase of at least eight trains a day on any segment of rail line affected by the proposal, or

(B) an increase in rail yard activity of at least 100% (measured by carload activity), or

(C) an average increase in truck traffic of more than 10% of the average daily traffic or 50 vehicles a day on any affected road segment, quantify the anticipated effect on air emissions. For a proposal under 49 U.S.C. §10901 (or §10505) to construct a new line or reinstitute service over a previously abandoned line, only the eight train a day provision in subsection (5)(i)(A) will apply.

Response: Not applicable

(5) Air. (ii) If the proposed action affects a class 1 or nonattainment area under the Clean Air Act, and will result in either:

(A) an increase in rail traffic of at least 50% (measured in gross ton miles annually) or an increase of at least three trains a day on any segment of rail line, or

(B) an increase in rail yard activity of at least 20% (measured by carload activity), or

(C) an average increase in truck traffic of more than 10% of the average daily traffic or 50 vehicles a day on a given road segment, then state whether any expected increased emissions are within the parameters established by the State Implementation Plan. However, for a rail construction under 49 U.S.C. §10901 (or 49 U.S.C. §10505), or a case involving the reinstatement of service over a previously abandoned line, only the three train a day threshold in this item shall apply.

Response: Not applicable.

(5) Air. (iii) If transportation of ozone depleting materials (such as nitrogen oxide and freon) is contemplated, identify: the materials and quantity; the frequency of service; safety practices (including any speed restrictions); the applicant's safety record

(to the extent available) on derailments, accidents and spills; contingency plans to deal with accidental spills; and the likelihood of an accidental release of ozone depleting materials in the event of a collision or derailment.

Response: The proposed action will not affect the transportation of ozone depleting materials.

(6) Noise. If any of the thresholds identified in item (5)(i) of this section are surpassed, state whether the proposed action will cause:

- (i) an incremental increase in noise levels of three decibels Ldn or more or
- (ii) an increase to a noise level of 65 decibels Ldn or greater. If so, identify sensitive receptors (e.g., schools, libraries, hospitals, residences, retirement communities, and nursing homes) in the project area and quantify the noise increase for these receptors if the thresholds are surpassed.

Response: Not applicable.

(7) Safety.

- (i) Describe any effects of the proposed action on public health and safety (including vehicle delay time at railroad grade crossings).
- (ii) If hazardous materials are expected to be transported, identify: the materials and quantity; the frequency of service; whether chemicals are being transported that, if mixed, could react to form more hazardous compounds; safety practices (including any speed restrictions); the applicant's safety record (to the extent available) on derailments, accidents and hazardous spills; the contingency plans to deal with accidental spills; and the likelihood of an accidental release of hazardous materials.
- (iii) If there are any known hazardous waste sites or sites where there have been known hazardous materials spills on the right-of-way, identify the location of those sites and the types of hazardous materials involved.

Response: (i) The proposed action will have no detrimental effects on public health and safety.

(ii) The proposed action will not affect the transportation of hazardous materials.

(iii) There are no known hazardous materials waste sites or sites where known hazardous material spills have occurred on or along the subject right-of-way.

(8) Biological resources.

(i) Based on consultation with the U.S. Fish and Wildlife Service, state whether the proposed action is likely to adversely affect endangered or threatened species or areas designated as a critical habitat, and if so, describe the effects.

(ii) State whether wildlife sanctuaries or refuges, National or State parks or forests will be affected, and describe any effects.

Response: (i) and (ii). The U.S. Fish and Wildlife Service and the National Park Service were contacted. No response has been received to date. Also, the Line does not appear to enter any national or state parks or forests, wildlife sanctuaries, or refuges.

(9) Water.

(i) Based on consultation with State water quality officials, state whether the proposed action is consistent with applicable Federal, State or local water quality standards. Describe any inconsistencies.

(ii) Based on consultation with the U.S. Army Corps of Engineers, state whether permits under Section 404 of the Clean Water Act (33 U.S.C. § 1344) are required for the proposed action and whether any designated wetlands or 100-year flood plains will be affected. Describe the effects.

(iii) State whether permits under Section 402 of the Clean Water Act (33 U.S.C. § 1342) are required for the proposed action. (Applicants should contact the U.S. Environmental Protection Agency or the state environmental protection or equivalent agency if they are unsure whether such permits are required.)

Response: (i) The U. S. Environmental Protection Agency Regional office and the Environmental Management Division of the Wisconsin Department of Natural Resources have been contacted. To date, there has been no

response. The National Oceanic and Atmospheric Administration (NOAA) has been contacted and provided a response of no impact. See e-mail attached to **Attachment 2**.

(ii) The U. S. Army Corps of Engineers (Corps) has been contacted. To date, there has been no response.

(iii) UP does not anticipate there will be any required Section 402 permits.

(10) Proposed Mitigation. Describe any actions that are proposed to mitigate adverse environmental impacts, indicating why the proposed mitigation is appropriate.

Response: There are no known adverse environmental impacts.

HISTORIC REPORT
49 C.F.R. § 1105.8(d)

(1) A U.S.G.S. topographic map (or an alternate map drawn to scale and sufficiently detailed to show buildings and other structures in the vicinity of the proposed action) showing the location of the proposed action, and the locations and approximate dimensions of railroad structures that are 50 years old or older and are part of the proposed action:

Response: See **Attachment No. 1.**

(2) A written description of the right-of-way (including approximate widths to the extent known), and the topography and urban and/or rural characteristics of the surrounding area:

Response: The Line extends approximately 0.88 miles from Milepost 49.12 to Milepost 50. There are no federally granted rights of way involved.

(3) Photographs of railroad structures on the property that are 50 years old or older and of the immediately surrounding area:

Response: See **Attachment No. 3.**

(4) The date(s) of construction of the structure(s), and the date(s) and extent of any major alterations to the extent such information is known:

Response to (3) and (4): There is one depot on the Line 50 years or older. See photograph in **Attachment No. 3.**

(5) A brief narrative history of carrier operations in the area, and an explanation of what, if any, changes are contemplated as a result of the proposed action:

Response: See UP's response to question (1) in the Environmental Report for a brief history and description.

(6) A brief summary of documents in the carrier's possession, such as engineering drawings, that might be useful in documenting a structure that is found to be historic:

Response: There is one structure on the Line 50 years or older, the depot at Jefferson Junction adjacent to the Clyman Subdivision. It will be retained for continued rail operations. Please refer to **Attachment No. 1** and **Attachment No. 3.**

(7) An opinion (based on readily available information in the UP's possession) as to whether the site and/or structures meet the criteria for listing on the National Register of Historic Places (36 C.F.R. § 60.4), and whether there is a likelihood of archeological resources or any other previously unknown historic properties in the project area, and the basis for these opinions (including any consultations with the State Historic Preservation Office, local historical societies or universities):

Response: The State of Wisconsin Historic Preservation Office has been contacted and has determined that the proposed undertaking will have no adverse effect on historic properties. Please see the response email attached to **Attachment 2**.

(8) A description (based on readily available information in the railroad's possession) of any known prior subsurface ground disturbance or fill, environmental conditions (naturally occurring or manmade) that might affect the archeological recovery of resources (such as swampy conditions or the presence of toxic wastes), and the surrounding terrain.

Response: UP does not have any such readily available information.

(9) Within 30 days of receipt of the historic report, the State Historic Preservation Officer may request the following additional information regarding specified non-railroad owned properties or groups of properties immediately adjacent to the railroad right-of-way. Photographs of specified properties that can be readily seen from the railroad right-of-way (or other public rights-of-way adjacent to the property) and a written description of any previously discovered archeological sites, identifying the locations and type of the site (i.e., prehistoric or native American):

Response: If additional information is requested, UP will promptly supply the necessary information.

Dated this 15th day of August, 2025.

Respectfully submitted,

/s/ Christine A. Neuharth

UNION PACIFIC RAILROAD COMPANY
Christine A. Neuharth
Senior Counsel
1400 Douglas St, MS1580
Omaha, NE 68179
402-544-4764
caneuhar@up.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Combined Environmental and Historic Report in Docket No. AB-33 (Sub-No. 354X), the Abandonment Exemption for the Jefferson Junction Lead in Jefferson County, WI, was served by First Class U.S. Mail, postage prepaid, or by e-mail as designated by the agency, on the 15th day of August, 2025, on the following parties:

State Clearinghouse (or Alternate):

Public Service Commission of Wisconsin
P.O. Box 7854
Madison, Wisconsin 53707-7854

State Environmental Protection Agency:

Environmental Management Division
Wisconsin Department of Natural Resources
101 S. Webster Street
PO Box 7921
Madison, WI 53707-7921

Head of Jefferson County, Wisconsin:

Jefferson County Administrator
311 S. Center Avenue, Room C2040
Jefferson WI 53549

Environmental Protection Agency (Regional Office):

US EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60604--3507

U.S. Fish and Wildlife Service:

U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

U.S. Army Corps of Engineers:

Headquarters, U.S. Army Corps of Engineers
441 G Street NW
Washington, DC 20314-1000

National Park Service:

National Park Service
1849 C Street NW
Washington, DC 20240

U.S. Natural Resources Conservation Service:

Natural Resource Conservation Service
1400 Independence Ave.
Washington, DC 20250

National Geodetic Survey:

NGS Information Services, NOAA, N/NGS12
Geodetic Services Division SSMC-3 #9340
1315 E-W Highway
Silver Spring, Maryland 20910-3282
rrae@noaa.gov

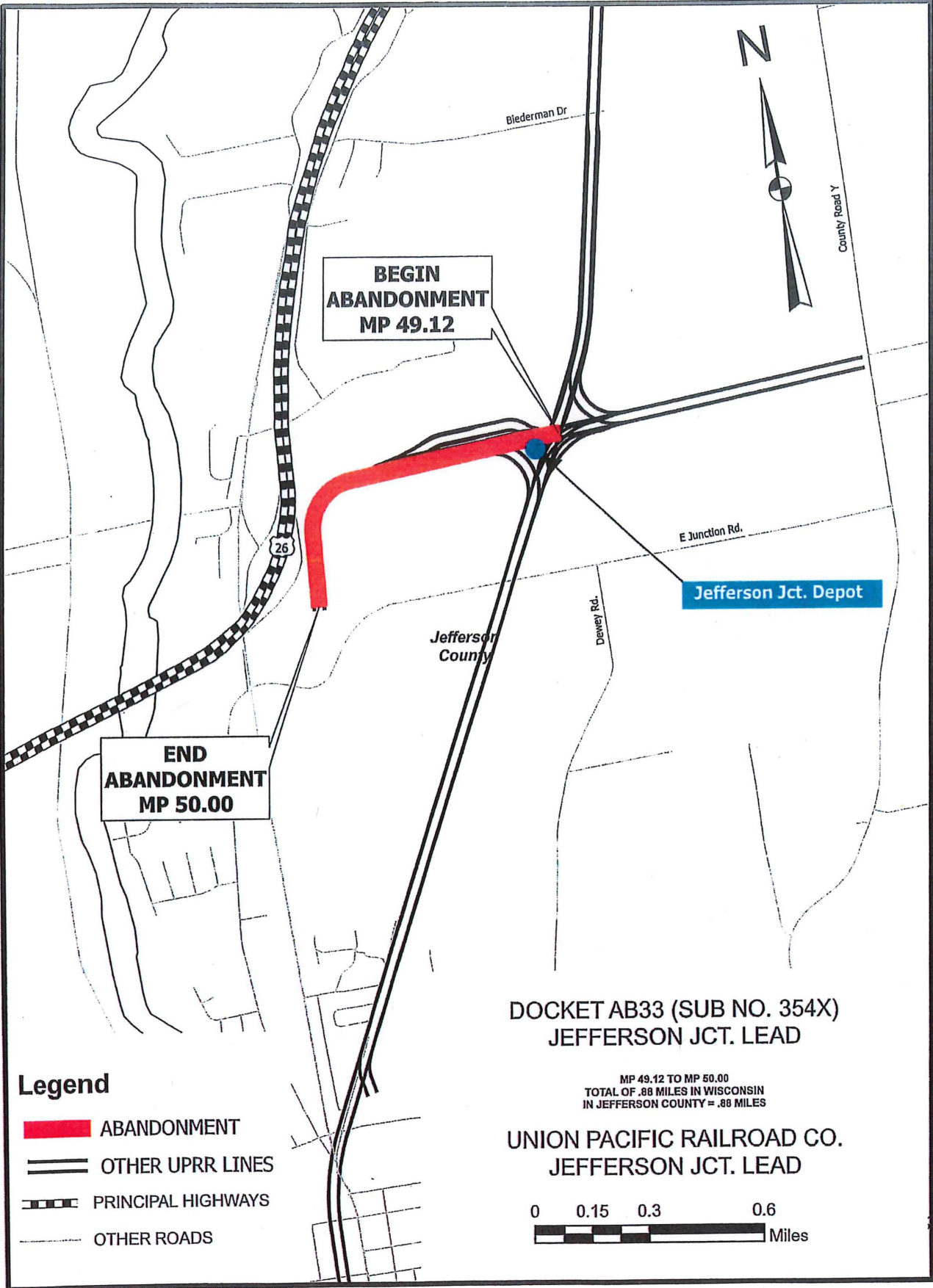
Wisconsin Historical Preservation Office:

Wisconsin Historical Society
State Historic Preservation Office
816 State Street
Madison, WI 53706
compliance@wisconsinhistory.org

Dated this 15th day of August, 2025

/s/ Christine A. Neuharth

Christine A. Neuharth





BUILDING AMERICA®

July 21, 2025

Via U.S. Mail or Email, as provided

State Clearinghouse (or Alternate):
Public Service Commission of Wisconsin
P.O. Box 7854
Madison, Wisconsin 53707-7854

State Environmental Protection Agency:
Environmental Management Division
Wisconsin Department of Natural Resources
101 S. Webster Street
PO Box 7921
Madison, WI 53707-7921

Head of Jefferson County, Wisconsin:
Jefferson County Administrator
311 S. Center Avenue, Room C2040
Jefferson WI 53549

Environmental Protection Agency (Regional Office):
US EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60604--3507

U.S. Fish and Wildlife Service:
U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

U.S. Army Corps of Engineers:
Headquarters, U.S. Army Corps of Engineers
441 G Street NW
Washington, DC 20314-1000

National Park Service:
National Park Service
1849 C Street NW
Washington, DC 20240

U.S. Natural Resources Conservation Service:
Natural Resource Conservation Service
1400 Independence Ave.
Washington, DC 20250

National Geodetic Survey:
NGS Information Services, NOAA, N/NGS12
Geodetic Services Division SSMC-3 #9340
1315 E-W Highway
Silver Spring, Maryland 20910-3282
rrae@noaa.gov

Wisconsin Historical Preservation Office:
Wisconsin Historical Society
State Historic Preservation Office
816 State Street
Madison, WI 53706
compliance@wisconsinhistory.org

Re: Proposed Abandonment and Discontinuance of the Jefferson Junction Lead, a total distance of approximately 0.88 miles in Jefferson County, Wisconsin; STB Docket No. AB-33 (Sub-No.354X)

To Whom It May Concern:

Union Pacific Railroad Company ("UP") plans to request authority from the Surface Transportation Board (STB) for UP to abandon and discontinue service on the Jefferson Junction Lead (the "Line") between railroad milepost 49.12 to milepost 50, a total distance of approximately 0.88 miles, near the city of Jefferson, all in Jefferson County, Wisconsin, traversing U.S. Postal Service Zip Codes 53549 and 53038 (the "Line"). The abandonment is to allow for the sale of the track to a customer who will remove and reconfigure the track adjacent to its facility. The reconfigured customer track will connect into Union Pacific's Clyman Subdivision, where Union Pacific will then provide rail service to the customer. The proposed Line for abandonment is shown in red on the attached map. The only structure on the Line, the Jefferson Junction depot, will be retained for continued railroad operations.

Pursuant to the STB's regulations at 49 C.F.R. Part 1152, 40 C.F. R. Part 1105.8, and the environmental regulations at 40 C.F. R. Part 1105.7, this is to request your assistance in identifying any potential effects of this action as indicated in the paragraphs below. We do not anticipate any adverse environmental impacts or impacts to any historic resources. However, if you identify any adverse impacts, describe any actions proposed to mitigate such impacts. Please provide us with a written response that can be included in a Consolidated Environmental and Historic Report, which will be sent to the STB as part of the filing to authorize abandonment of the Line.

TRANSPORTATION SYSTEM. Describe the effects of the proposed action on regional or local transportation systems and patterns.

LOCAL AND/OR REGIONAL PLANNING AGENCIES. State whether the proposed action is consistent with existing land use plans. Please describe any inconsistencies.

U.S. SOIL CONSERVATION SERVICE. State the effect of the proposed action on any prime agricultural land.

U.S. FISH AND WILDLIFE SERVICE (And State Game and Parks Commission, If Addressed). State (1) whether the proposed action is likely to adversely affect endangered or threatened species or areas designated as a critical habitat, and if so, describe the effects, and (2) whether wildlife sanctuaries or refuges, National or State parks or forests will be affected, and describe any effects.

STATE WATER QUALITY OFFICIALS. State whether the proposed action is consistent with applicable Federal, State or Local water quality standards. Please describe any inconsistencies.

U.S. ARMY CORPS OF ENGINEERS. State (1) whether permits under Section 404 of the Clean Water Act (33 U.S. C. § 1344) are required for the proposed action and (2) whether any designated wetlands or 100-year flood plains will be affected. Please describe the effects.

U.S. ENVIRONMENTAL PROTECTION AGENCY AND STATE ENVIRONMENTAL PROTECTION (OR EQUIVALENT AGENCY). (1) Identify any potential effects on the surrounding area, (2) identify the location of hazardous waste sites and known hazardous material spills on the right-of-way and list the types of hazardous materials involved, and (3) state whether permits under Section 402 of the Clean Water Act (33 U.S.C. § 1342) are required for the proposed action.

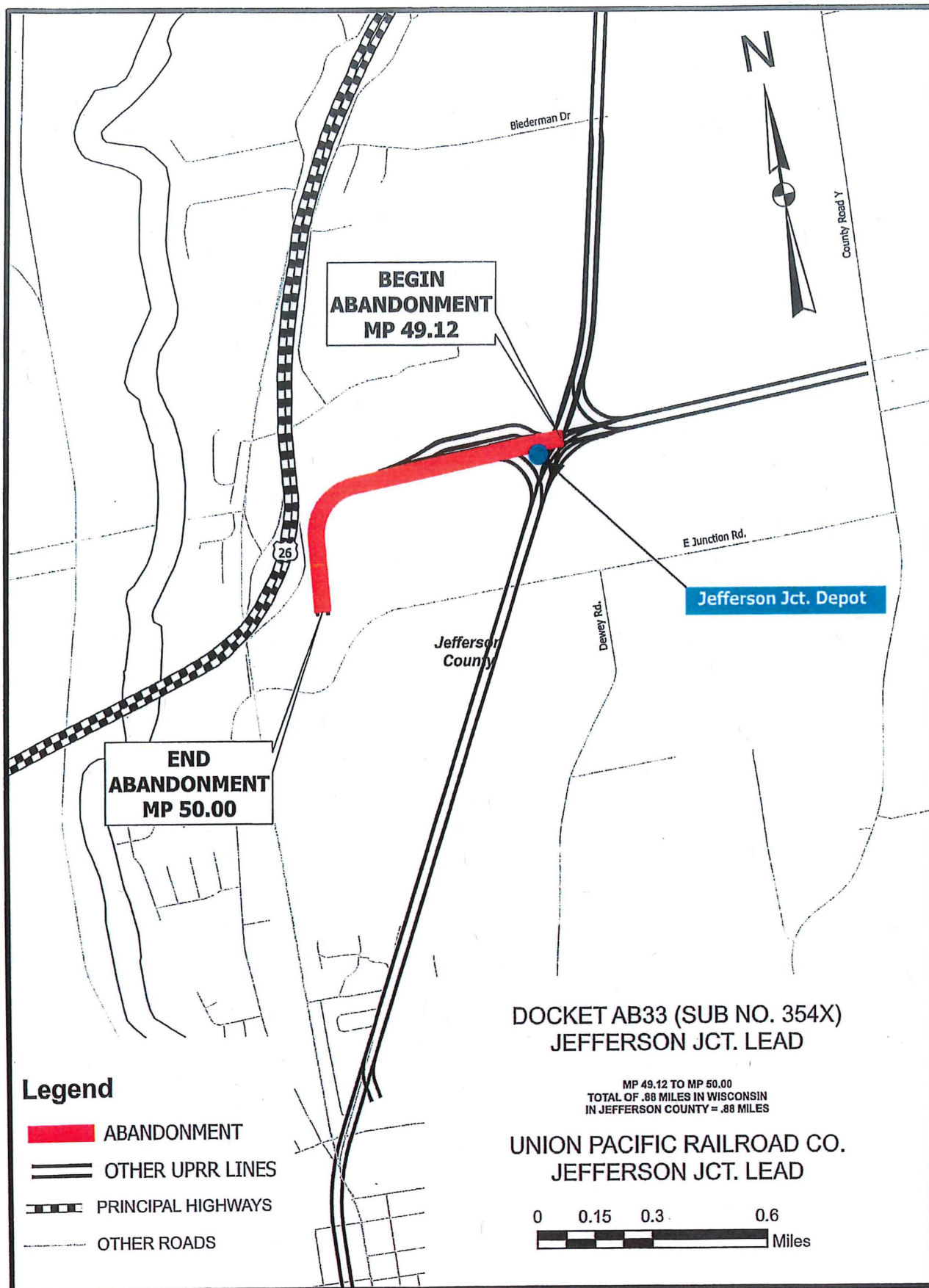
Thank you for your assistance. Please send your reply to the undersigned.

Sincerely,



Christine A. Neuharth
Senior Counsel

Attachment: Map



Lori Casey

From: NOS NGS JIRA <ngs.infocenter@noaa.gov>
Sent: Tuesday, July 22, 2025 10:51 AM
To: Lori Casey
Subject: [JIRA] (IMOV-16626) Proposed Rail Abandonment - Union Pacific - Consultation Letter - Surface Transportation Board Docket No. AB_33_354X

You don't often get email from ngs.infocenter@noaa.gov. [Learn why this is important](#)

*** PROCEED WITH CAUTION - This email was sent from outside the company. ***

A comment is added on your issue:

Re: Proposed Rail Abandonment - Union Pacific - Consultation Letter - Surface Transportation Board Docket No. AB_33_354X

Thank you for your submission. After reviewing the provided document, I see no benchmarks in the proposed area and this abandonment will have no impact on NGS.

Timothy Salisbury

Physical Scientist,

NOAA National Geodetic Survey

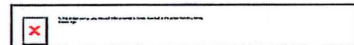
N/NGS4 SSMC3 #8604

1315 East-West Hwy

Silver Spring MD 20910

Phone: [240 533 9620|tel:(240)%20533-9638]

This message was sent by Atlassian Jira (v9.12.13#9120013-sha1:30aec69)



Lori Casey

From: kimberly.cook@wisconsinhistory.org
Sent: Monday, August 11, 2025 9:06 AM
To: Lori Casey
Subject: SHPO Review: 25-1783/JE - Rail Abandonment of Jefferson Junction Lead, Jefferson County, WI

You don't often get email from kimberly.cook@wisconsinhistory.org. [Learn why this is important](#)

*** PROCEED WITH CAUTION - This email was sent from outside the company. ***

Dear Ms. Lori Casey,

We have completed our review of WHS #25-1783, Rail Abandonment of Jefferson Junction Lead, Jefferson County, WI and find that no eligible properties will be affected (i.e. none are present or there are historic properties present but the project will have no effect upon them).

If plans change or cultural materials/human remains are found during the project, please halt all work and contact our office with photos of the find for identification.

Please use this email as your official SHPO concurrence for NHPA requirements of the project. If you require a hard copy signed form, please contact me and I will provide you a signed copy as soon as possible.

Sincerely,

Kimberly Cook
Compliance Reviewer
State Historic Preservation Office

Wisconsin Historical Society
816 State Street, Madison, WI 53706

kimberly.cook@wisconsinhistory.org

Wisconsin Historical Society
[Collecting, Preserving, and Sharing Stories Since 1846](#)

Lori Casey

From: Lori Casey
Sent: Thursday, August 14, 2025 1:57 PM
To: Lori Casey
Subject: FW: Proposed Abandonment and discontinuance of Jefferson Junction Lead
Attachments: Scanned from a Xerox Multifunction Printer.pdf

From: Ziegler, Jeremy - FPAC-NRCS, WI <jeremy.ziegler@usda.gov>
Sent: Thursday, August 14, 2025 1:38 PM
To: Christine Neuharth <CANEUHAR@UP.COM>
Cc: Smith, JenniferL - FPAC-NRCS, WI <JenniferL.smith@usda.gov>
Subject: Proposed Abandonment and discontinuance of Jefferson Junction Lead

You don't often get email from jeremy.ziegler@usda.gov. [Learn why this is important](#)

*** PROCEED WITH CAUTION - This email was sent from outside the company. ***

Hello Christine,

The USDA-NRCS has reviewed your project located in Jefferson County, WI. The project is not subject to the Farmland Protection Policy Act. The project would fall under the exemption:

523.11 Activities Covered by the Act

Other Exemptions

Small acreages (i.e., 10 acres or less per linear mile or 3 acres where there is a project for an existing bridge or interchange) where a statewide, local, or tribal LESA system has been approved by the State Conservationist. Acreage includes both direct and indirect conversions. These exemptions are to avoid new construction and encourage improvements to existing linear projects, such as highways.

Thank you for allowing the NRCS to comment on your project.

Best,

Jeremy Ziegler
Area Resource Soil Scientist
USDA-NRCS
Juneau SE Area Office



U.S. DEPARTMENT OF AGRICULTURE

NRCS

451 West North Street, Juneau, WI 53039-1120
p: (920) 386-9999 ext. 3022 | c: (920) 210-9007

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

PHOTO FROM GOOGLMAPS (2024)

Depot at Jefferson Junction adjacent to the Clyman Subdivision

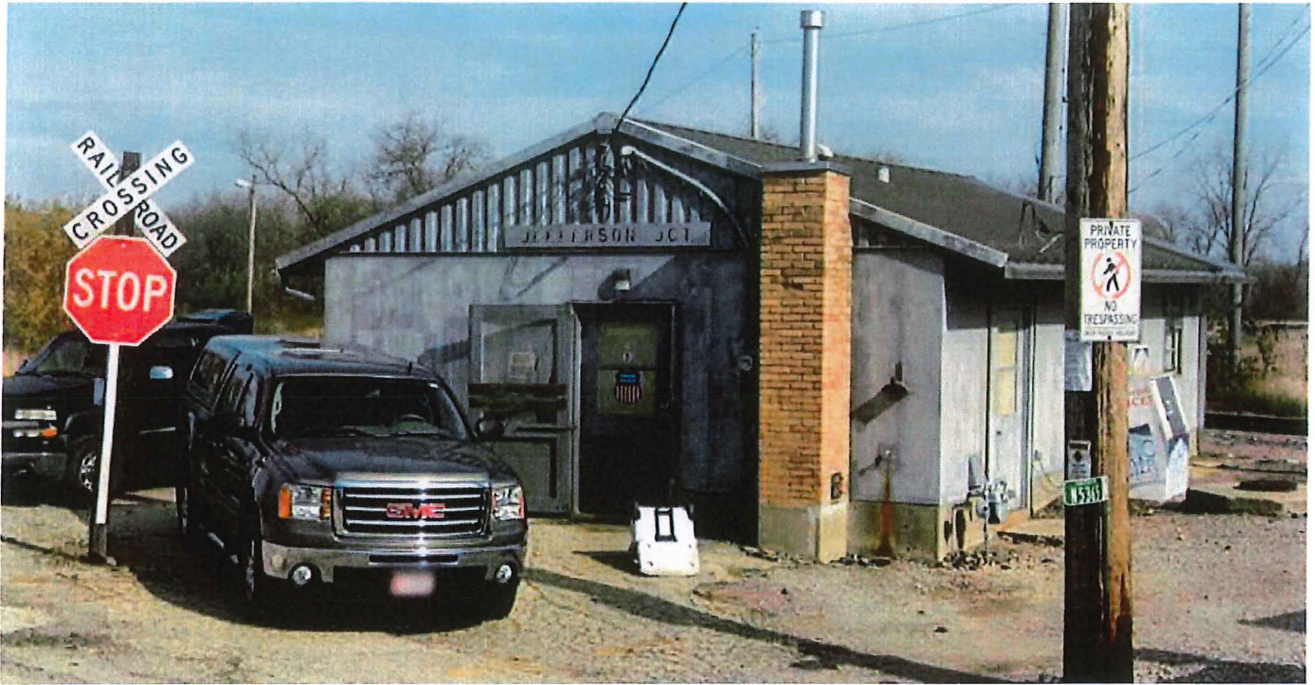


Exhibit 4 – Attachment 1

Abandonment of the Jefferson Junction Lead, Jefferson, WI.
Surface Transportation Board Docket No. AB33_354X

Response of U.S. Fish and Wildlife Service

Summary of the telephone message received from Rob Tawes, U.S. Fish & Wildlife Service, MN-WI field office supervisor, 3815 American Blvd. East Bloomington, MN 55425 [Rob Tawes, Field Supervisor, U.S. Fish and Wildlife Service Minnesota-Wisconsin Ecological Services Field Office Ecological Services](#) by Christine Neuharth, Senior Counsel for Union Pacific, on September 8, 2025:

The regional office forwarded the letter you sent regarding a rail line abandonment in Jefferson, WI— the ~.8-mile abandonment in a rural area. We don't have any concerns on that so wanted to pass that along as we are not going to be sending a letter.

Draft Federal Register Notice
Docket No. AB-33 (Sub-No. 354X) - Notice of Petition for Exemption to Abandon

On September 24, 2025, Union Pacific Railroad Company (“UP”) filed with the Surface Transportation Board, Washington, D.C. 20423, a petition for exemption for the abandonment of a line of railroad known as the Jefferson Junction Lead, extending from railroad milepost 49.12 at the Clyman Subdivision to milepost 50, which traverses through U.S. Postal Service Zip Codes 53549 and 53038, a distance of approximately 0.88 miles, near the City of Jefferson, Jefferson County, Wisconsin.

The line does not contain federally granted rights-of-way. Any documentation in the railroad's possession will be made available promptly to those requesting it.

The interest of railroad employees will be protected by the labor protection conditions imposed in abandonment proceedings as prescribed in *Oregon Short Line R. Co. – Abandonment – Goshen*, 360 ICC 91 (1979).

With its petition, UP requested an exemption from the offer of financial assistance (“OFA”) provisions at 49 U.S.C. § 10904 and waiver of the OFA regulations at 49 C.F.R. § 1152.27. If the Board denies UP’s request for OFA exemption, any OFA will be due no later than 10 days after service of a decision granting the petition for exemption.

With its petition, UP requested an exemption from the public use regulations at 49 C.F.R. § 1152.28 and UP does not believe the line is suitable for public use or interim trail use. If the Board denies UP request for public use exemption, all interested persons should be aware that following abandonment of rail service and salvage of the line, the line may be suitable for other public use, including interim trail use.

Any request for a public use condition and any request for trail use/rail banking will be due no later than 20 days after notice of the filing of the petition for exemption is published in the *Federal Register*.

Persons seeking further information concerning abandonment procedures may contact the Surface Transportation Board or refer to the full abandonment or discontinuance regulations at 49 CFR part 1152. Questions concerning environmental issues may be directed to the Board's Office of Environmental Analysis.


An environmental assessment (EA) (or environmental impact statement (EIS), if necessary) prepared by the Office of Environmental Analysis will be served upon all parties of record and upon any agencies or other persons who commented during its preparation. Any other persons who would like to obtain a copy of the EA (or EIS) may contact the Office of Environmental Analysis. EAs in these abandonment proceedings normally will be made available within 60 days of the filing of the petition. The deadline for submission of comments on the EA will generally be within 30 days of its service.

VERIFICATION


State of Nebraska)
) ss:
County of Douglas)

I, Olin H. Dirks, Manager – Commercial and Interline Strategy, for Union Pacific Railroad Company declare under penalty of perjury, under the laws of the United States of America, that I have read the forgoing document and that its assertions are true and correct to the best of my knowledge, information and belief. I further declare that I am qualified and authorized to submit this verification on behalf of Union Pacific Railroad Company.

Dated at Omaha, Nebraska, this 24th day of September, 2025.



SUBSCRIBED AND SWORN TO
before me this 24th day of
September, 2025.



Notary Public

